

VIA CM/ECF

The Honorable Jennifer L. Hall
J. Caleb Boggs Federal Building
844 N. King St.
Wilmington, DE 19801-3555

Re: Vytacera Bio, LLC v. CytomX Therapeutics, Inc., 1:20-cv-00333-JLH-CJB

Dear Judge Hall:

This is Response to Memorandum Order.

It is understood that Goldberg Segalla LLP is the counsel for Plaintiff Vytacera Bio, LLC and that Goldberg Segalla has not terminated its engagement agreement with Plaintiff.

It is understood that Michael A. Siem, Michael Barresi, and Lynn Lehnert are lead counsels for Plaintiff.

It is believed that Siem, Barresi and Lehner have developed the new theory of literal infringement and the theory of infringement under the doctrine of equivalents. These counsels have not explained these theories to Plaintiff in detail. It is believed that only Siem, Barresi and Lehner in collaboration with Goldberg Segalla could prepare the amended updated infringement contentions in the amended complaint.

It is believed that neither Siem, Barresi and Lehner nor Goldberg Segalla are willing to prepare and file the amended complaint with updated infringement contentions, as suggested by the Court.

It is believed that this is not how attorneys are supposed to treat their client and the Court.

Best regards,



Vit Lauermann
Vytacera Bio, LLC

Date: October 24, 2024